

Declaration of Kristen Seymour

I am Kristen Seymour. I am the Executive Assistant for Tax Defender, LLC ("Tax Defender"). I have been employed by Tax Defender for 1 year, and the information contained within this Declaration is within my personal knowledge and gained from my employment. All is true and correct.

Tax Defender USA is an assumed name of Tax Defender, LLC. Thomas Cahill is the President of Tax Defender LLC. He was not involved in any of the purported telephone calls made a part of Plaintiff's Complaint.

As part of my job responsibilities, I have knowledge of Tax Defender's marketing efforts including oversight and involvement in Tax Defender's telephone solicitation practices. Tax Defender does not solicit customers using an automatic telephone dialing system. Tax Defender does not market its products or solicit customers using any technology that places calls using a random or sequential number generator or autodialer. Tax Defender does not contract with or employ any other telemarketing service which utilizes such equipment or technology to market Tax Defender's goods or services.

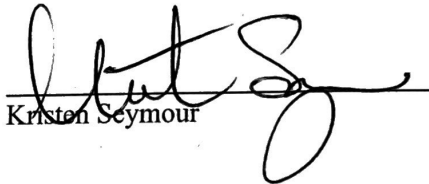
Attached to my Declaration, and identified as Exhibits A and B, are recorded calls which have been referenced in Plaintiff's Complaint. Exhibit A is a recording of a call placed to Plaintiff by Tax Defender on April 8, 2022. Exhibit B is a recording of a call placed to Plaintiff by Tax Defender on April 21, 2022. Tax Defender, as a matter of policy, records its calls made to customers and potential customers. Tax Defender does not utilize any prerecorded messages when it markets to or solicits customers.

Tax Defender trains its employees who market to and solicit customers for its goods and services. Tax Defender has in place technology which 'scrubs' potential leads for those

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telephone numbers which have been registered on the Do Not Call Registry. All employees are trained that no calls are to be placed to those numbers which are found on the Do Not Call Registry unless a specific request or inquiry has been made. Inquiries made to Tax Defender will receive a telephone call from an individual explaining the benefits of Tax Defender's goods and services.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 19, 2022.


Kriston Seymour

7/19/22